



**48 Wall Street, Suite 11, Manhattan, NY 10005**

July 14, 2019

**VIA ECF**

Honorable Ona T. Wang  
United States Magistrate Judge  
Southern District of New York  
500 Pearl Street  
New York, NY 10007

**Re: Colon v. The City of New York, et al. No. 16-CV-4540**  
**Williams v. The City of New York, et al. No. 16-CV-8193**

Dear Magistrate Wang:

The Florestal Law Firm, PLLC is counsel to Sibyl Colon and Allison Williams (hereinafter, collectively “Plaintiffs” or individually “Ms. Colon” and “Ms. Williams”), in the above referenced matter. Discovery in the above referenced matters is scheduled to conclude on Monday, July 15, 2019. However, opposing counsel Jane Lippman, Esq., attorney for Defendants New York City Housing Authority, Michael Kelly and Brian Clarke (collectively, “NYCHA Defendants”) has prevented Michael Kelly’s deposition from taking place on July 3, 2019, as she walked out of the deposition less than two (2) hours after it began. Due to the holiday the court reporting company is delayed in sending out the transcript, and thus, I am currently unable to file my letter motion to compel. I anticipate receiving the July 3<sup>rd</sup>, transcript any day this week, and will promptly file our motion. On, or about, July 11, 2019, counsels met and conferred pursuant to your Honor’s individual rules, but the parties remain at odds.

Respectfully,

/s/ Marcel Florestal

cc: All counsel via electronic mail.